

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**IN RE ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

Cases Listed in Plaintiffs' Exhibit A

**Master File No. 2:12-MD-02327
Wave 12: MDL 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO DAUBERT
MOTION TO EXCLUDE EXPERT TESTIMONY OF PETER JEPSSON, M.D.**

In response to Plaintiffs' notice adopting their prior *Daubert* motions as to Peter Jeppson, M.D. (Doc. 8721 (adopting Docs. 8324 & 8325)), Defendants hereby adopt and incorporate by reference their prior responsive briefing (Doc. 8401) in opposition to the motion to exclude his testimony. Defendants respectfully request that the Plaintiffs' motion be denied for the reasons stated in the prior briefing.

This notice applies to the Wave 12 cases identified in Plaintiffs' Exhibit A.

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar No. 8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar No. 5169)
Thomas Combs & Spann PLLC
300 Summers Street

Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

**COUNSEL FOR DEFENDANTS ETHICON,
INC., AND JOHNSON & JOHNSON**

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
COUNSEL FOR DEFENDANTS